

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE WIRE HARNESS  
SYSTEMS ANTITRUST LITIGATION

MDL No. 2311

THIS DOCUMENT PERTAINS TO:  
ALL ACTIONS

**Case No. 12-md-02311-MOB  
CLASS ACTION**

Assigned to the Honorable Marianne O. Battani

**PROPOSED AGENDA FOR THE MARCH 16, 2012  
INITIAL STATUS CONFERENCE**

Plaintiff Craig Vanhoutte, through his counsel Brian R. Strange, in the case entitled *Vanhoutte v. Yazaki Corporation, et al.* U.S.D.C. Eastern District of Michigan, Case No. 2:12-cv-11054-PDB-MHK, respectfully submits the following proposed agenda items in advance of the March 16, 2012 initial status conference, pursuant to the Court's February 17, 2012 Order Setting Initial Status Conference (Dkt. No. 1) ("Order"):

## **Proposed Agenda Items**

### **1. The Relationship Between This Action and the Three Pending MDLs Currently Before the JPML**

This action and the relationship with *In re Instrument Panel Clusters Antitrust Litigation*, MDL No. 2349, *In re Fuel Senders Antitrust Litigation*, MDL No. 2350, and *In re Heating Control Panels Antitrust Litigation*, MDL No. 2351, may affect the leadership structure and organization of this case.

- Investigation by the Japanese Fair Trade Commission (“JFTC”), the European Commission (“EC”) and the United States Justice Department were coordinated, but not identical, for each component of the other MDLs. Investigation results were announced at different times.
- Some of the same counsel here will be involved in the other MDLs.
- Some of the defendants here are involved in the other MDLs and others may be added. Some of the same plaintiffs here are plaintiffs in the other MDLs.
- Discovery should be coordinated between the MDLs as witnesses, investigations, and documents will overlap.

### **2. Timing and Structure for Appointment of Lead or Liaison Counsel**

Plaintiffs respectfully suggest that each counsel, if they so desire, have the opportunity to orally present his or her application during the March 16<sup>th</sup> initial status conference to assist this Court with the decision of appointing the most qualified interim Lead and Liaison Counsel possible.

**3. The Deadlines and Schedules for Plaintiffs' Consolidated Amended Complaint(s) and Dispositive Motions, Including any Motions to Dismiss**

The timing for filing of amended consolidated complaints should be sufficiently after the appointment of leadership to allow consideration of the many complex issues. Counsel suggests 60 days after appointment of leadership for filing of the consolidated amended complaints.

**4. Timing of the Parties' Exchange of Their Rule 26 Initial Disclosures**

Counsel respectfully suggest that the Court set a date for exchange of Rule 26(a) initial disclosures after the Court has appointed Plaintiffs' interim leadership in this MDL action.

**5. Case Management Orders, Including (i) Confidentiality Order; (ii) Document Preservation Order; and (iii) ESI Order**

Interim preservation orders should be considered by the Court. Plaintiffs respectfully suggest that a Confidentiality Order, a Document Preservation Order, and an ESI Order should be negotiated and presented to the Court for consideration and entry as expeditiously as possible after Interim Lead Counsel are selected.

Dated: March 9, 2012

**STRANGE & CARPENTER**

/s/  
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*Attorneys for Plaintiff Craig Vanhoutte and all  
others similarly situated*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed through the CM/ECF system on March 9, 2012, which automatically serves an electronic notice to all registered individuals.

Dated: March 9, 2012

**STRANGE & CARPENTER**

/s/

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